

Charleston Research Institute Policy Memorandum

Title: Whistleblower Protection Policy

Reviewed by: Board of Directors

Implementation Date: April 18, 2005

Reviewed Dates: June 10, 2008, June 28, 2011, June 27, 2014

Next Scheduled Review Date: June 27, 2017

Approval: M. Rita I. Young, Ph.D., Chairperson

Policy Statement:

Charleston Research Institute encourages its employees to report suspected or actual illegal or improper activity, financial or otherwise. Charleston Research Institute will not condone any activity that is illegal or improper, whether done by a Board Member or employee.

No director, officer or employee who in good faith reports a violation shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This whistleblower protection policy is intended to encourage and enable employees and others to raise serious concerns within CRI prior to seeking resolution outside CRI. At the discretion of VA, in some cases it may be appropriate to report violations of this policy through established VA channels and in accordance with the Whistleblower Protection Act (codified at 5 USC § 2302(b)(8)).

Background:

Charleston Research Institute (CRI) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties. As employees and representatives of the CRI, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Guidelines:

It is the responsibility of all directors, officers and employees to report violations or suspected violations in accordance with this Whistleblower Protection Policy.

Charleston Research Institute has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Executive Director or a member of the Board of Directors whom you are comfortable in approaching. Supervisors are required to report suspected violations to the Executive Director, who has specific and exclusive responsibility to investigate all reported violations.

For suspected fraud, or when you are not satisfied or are uncomfortable with following CRI's open door policy, individuals should contact the Executive Director directly or a member of the Board of Directors.

The Executive Director is responsible for investigating and resolving all reported complaints and allegations concerning violations and shall advise the Chairperson of the Board of Directors and the Board of Directors of all reported complaints and allegations.

The Audit Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Executive Director shall immediately notify the Chairperson of the Board of Directors and the Board of Directors of any such complaint and work with the Audit Committee until the matter is resolved.

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. The Executive Director will notify the filer of the complaint and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.